



EASTERN RESEARCH GROUP, INC.

MEMORANDUM

TO: Rick Crume, U.S. Environmental Protection Agency (EPA),
Office of Air Quality Planning Standards (OAQPS), (MD-13)

FROM: Susan Radomski, Eastern Research Group (ERG), Morrisville

DATE: January 12, 1997

SUBJECT: Draft Summary of November 20, 1997 Meeting of the Industrial Combustion
Coordinated Rulemaking (ICCR) Incinerator Work Group

1.0 INTRODUCTION

- The purpose of the meeting was to allow attendees to review, discuss and follow up on the results of the November 18-19 ICCR Coordinating Committee meeting, the finalization of subcategorization and other activities of the Incinerator Work Group. A meeting agenda outlining the topics of discussion is included as attachment 1.
- The meeting was held on November 20, 1997 in Houston, Texas.
- A complete list of meeting attendees (with their affiliations) is included as attachment 2.

2.0 SUMMARY OF DISCUSSION AND DECISIONS

The meeting discussion generally followed the agenda. Topics of conversation are summarized in the following sections:

- 2.1 Incinerator Work Group Membership
- 2.2 ICCR Process Changes
- 2.3 Coordinating Committee Meeting Review and Related Discussion
- 2.4 Coordination Between the Boiler and Incinerator Work Groups
- 2.5 Solid Waste Definition
- 2.6 Review of Work Group Tasks
- 2.7 Subteam Reviews
- 2.8 Action Items

2.1 Incinerator Work Group Membership

- Rick Crume, the EPA Co-chair, announced that he expects to receive nominations for two new Work Group members; Daniel Meijer, a citizen of Silver Spring, Maryland, and Nathan Begg of the Missouri Department of Natural Resources.
- Rick Crume mentioned that Work Group members who have missed more than 50% of the meetings will be receiving emails suggesting that members unable to commit more time to the process remove their name from the membership list.

2.2 ICCR Process Changes

- Rick Crume outlined the results from the ICCR Satisfaction Survey that had been distributed to the Work Group members. He concluded that many survey respondents appear to be frustrated by the slow progress of the process, the long discussions which sometimes end without any decisions being made and the micromanagement of the Work Groups by the Coordinating Committee.
- Rick Crume announced EPA's decision that, in response to concerns expressed in the Satisfaction Survey, the ICCR process needs to return to the original model as defined in the ICCR Organizational Structure and Process document. In particular, this document stresses reaching closure on issues, the important role of the Work Groups, and the Coordinating Committee's role to advise and coordinate, but not to micromanage. Additionally, EPA will be taking a greater leadership role in the process, especially at the work group level. Finally, Work Group co-chairs will work closer with facilitators to minimize repetition and recognize non-consensus.

2.3 Coordinating Committee Meeting Review and Related Discussion

- A Pollution Prevention Subgroup is being formed to investigate the incorporation of pollution prevention techniques into the ICCR process. These techniques may include more efficient combustion practices, waste separation, using less fuel, making changes to the process for which the combustion unit is used or reusing flue gas.
- The Pollution Prevention Subgroup Charter, as created by the Coordinating Committee, requests that the Incinerator Work Group provide three members. Bob Morris of The Coastal Corporation and Beth Berglund of Merck and Company expressed interest in taking part. Ms. Berglund will discuss with her management the possibility of putting more time into the process before committing to the new Subgroup. Ed Wheless of Los Angeles County Sanitation Districts also suggested that Ed Repa, from the National Solid Waste Management

Association, may be interested in working with the new Subgroup. [Note: Rick Crume subsequently contacted Ed Repa and he agreed to serve on this Subgroup.]

- The Survey Database has been returned to the company that scanned the data to receive further QA/QC. This check is expected to remove mistakes such as typing errors and duplications found in the current version. The database will then be returned to ERG and prepared for re-release.
- A spot check of surveys that indicated in Part I that the facilities had HAP emission test data showed that only 19% actually had the data. However, the survey for facilities that indicated in Part II the types of HAPs and criteria pollutants for which they had test data seemed correct. The Incinerator Work Group is charged with looking at these surveys and deciding which test reports are needed. The Work Group may want to look into getting these reports from trade groups affiliated with the facilities. Norm Morrow of Exxon Chemical Americas pointed out that some subteams may also find test information in STIRs or other data sources.
- The Survey Database information may include some units subject to the Hospital and Medical Infectious Waste Incineration rule, which are outside the scope of the ICCR. Beth Berglund requested that ERG remove these units from the database.
- A suggestion was made that any subteam requesting data collection make sure that the data are necessary for regulation writing and not just interesting data. So far, many data requests have not been linked to control devices or operating practices.
- A request has been made by the Coordinating Committee asking Work Groups to provide additional information on Inventory Database units when possible. Norm Morrow stressed that no guesses should be made, and changes should be based on actual facility data, not assumptions.

2.4 Coordination between the Boiler and Incinerator Work Groups

- Norm Morrow outlined the discussion between the Incinerator Work Group and Boiler Work Group about developing an efficient method for meeting deadlines set in the ICWI litigation. The deadlines affect both Work Groups, because some boilers may be subject to Section 129 rules.
- Jeff Shumaker of International Paper recommended that the Incinerator Work Group do most of the writing necessary to meet the ICWI deadline. The Boiler Work Group will rewrite certain paragraphs, adapting them to boiler specific data and definitions and write others specific to boilers. These new paragraphs will then be included with the ICWI document.

- Norm Morrow suggested that a small joint team consisting of the EPA and Industry Co-chairs from each Work Group and one environmental representative be created to coordinate between the two Work Groups. The individuals representing the Incinerator Work Group are Rick Crume, Norm Morrow and Dick Van Frank of the A.W. Butler Chapter of the National Audubon Society.
- Beth Berglund pointed out that ICWI work should receive priority over OSWI, because ICWI has a tighter time frame. She suggested that the Work Groups begin by completing the work necessary for the ICWI litigation and then incorporate OSWI as a second phase of the project.

2.5 Solid Waste Definition

- Jeff Shumaker discussed the work completed by the Solid Waste Definition Subgroup. The work product, which includes papers outlining both the Environmental Caucus and Industry Caucus views on the subject, has been completed and posted on the TTN. EPA hopes to resolve the issue by the time of the February Coordinating Committee meeting. Until then, Norm Morrow suggested that the Work Group move ahead, keeping in mind which materials are in question.
- Dick Van Frank clarified that three work products may be found on the TTN. These include Subgroup recommendations, the Environmental Caucus Position Paper and the Solid Waste Definition Industry Caucus Response.

2.6 Review of Work Group Tasks

- Rick Crume outlined some of the ongoing and upcoming Work Group tasks. Currently, the Work Group is working on database review and subcategorization. Next, the Work Group needs to determine what testing is necessary and begin to develop model plants.
- Rick Crume and Fred Porter of EPA discussed the decision reached by EPA staff to give highest priority for the immediate future to the Section 129 incinerator subcategories, stressing that this is an internal EPA decision involving the allocation and prioritization of resources, and that the Incinerator Work Group is free to reach its own decision about setting priorities. Mr. Crume and Mr. Porter also discussed the decision reached by EPA staff to move the small MWC subcategory out of the ICCR process, to be handled by the EPA team currently addressing medium-size MWCs. Several Work Group members expressed support

for these EPA staff decisions, but the Work Group as a whole did not discuss whether to adopt the EPA staff's priorities.¹

- Norm Morrow mentioned that many units listed as MWCs also burn other materials. He requested that EPA give the Work Group a definition to help categorize such units. Fred Porter replied that the Section 129 definition of an MWC is an unit that burns at least 30% municipal waste by weight. However, some other factors may be taken into account.
- Rick Crume discussed the methods the Work Group may use to develop model plants. The most immediate needs are the final subcategory definitions, the number of facilities for each, a basis for groupings of the facilities, and lists of the wastes and fuels burned, control alternatives, HAPs emitted and control efficiencies.
- Rick Crume outlined the planning steps necessary for emission testing. After assessing the need for data the Work Group should attempt to obtain the information through existing State regulation and permit documents before requesting emission testing. The available information on applicable control technology needs to be studied along with the feasibility of testing. A Test Cost Model is available on the TTN under the Testing & Monitoring Work Group heading.
- A Work Group member inquired if EPA may send an introductory letter to facilities chosen by subteams for data collection beyond that accomplished with the ICR. Fred Porter stated that EPA may not collect data beyond that gathered by the ICR. Therefore, any data collection from facilities not included in the ICR must be done by the Work Group with assistance from the organizations they represent.

2.7 Subteam Reviews

- Subteam 1 is continuing their database review by looking for more information on control equipment. They have developed a preliminary database on HAPs and are collecting emission data from container and incinerator manufacturers. They are also looking into the possibility of dividing some current subcategories into multiple subcategories based on unit capacity.
- Subteam 2 currently has three subcategories, but they are attempting to narrow it down to two. They are currently working only with database information that appears complete and reasonable and are not using questionable data. They will begin planning model plant work soon.

¹ See the discussion on flash minutes at the end of these full meeting minutes.

- Subteam 3 has been calling ICR respondents to verify information from the survey. They have found many misunderstandings in data recording and incorrect scanning. The subteam requested a method for verifying database information through ERG. [The Work Group was subsequently informed that facilities in the Survey Database should only be contacted by EPA and its contractors.]
- Subteam 4 has several objectives for the February meeting. They plan to get emission tests for units of interest, begin working with the new version of the Survey Database and look for non-combustion methods for some processes currently covered by the subteam.
- Norm Morrow pointed out that Subteam 5 would have few units if the small MWC units are not handled under the ICCR. He suggested that the Subteam be split up. Dick Van Frank agreed that if a decision has been made to move MWCs, the subteam should be disbanded. The remaining subcategories were distributed to the most applicable subteam and the subteam members moved to one of the other four subteams. Subteam 3 accepted the subcategories of Construction/ Demolition Waste and Agricultural Waste and Subteam 2 will handle Landfill Gas Flares.

2.8 Action Items

- Rick Crume will provide guidance on the contents of the Regulatory Alternatives Paper, the applicability of the ICWI/OSWI rules, a detailed milestone schedule, the MACT process, and procedures for verifying data found in the ICCR database.
- Rick Crume will invite a representative of the Economics Work Group to give a presentation at the Incinerator Work Group meeting in February.
- Rick Crume will contact Ed Repa about taking part in the Pollution Prevention Work Group.

3.0 UPCOMING MEETINGS

- February 5: Work Group meeting to be held in Orlando, Florida.
- April 30: Work Group meeting to be held in Fort Collins, Colorado. (Note: the Coordinating Committee will meet in Fort Collins on April 28 and 29)

Note Regarding Flash Minutes For November 20 Incinerator Work Group Meeting

Regarding Rick Crume's statement at the November 20 Incinerator Work Group meeting about EPA's position on small MWCs, the flash minutes for this meeting note that:

Rick Crume presented the EPA view that small MWCs should be addressed with larger MWCS and not as part of the ICCR. The Work Group agreed.

Although the flash minutes were approved as read at the end of the meeting, it subsequently was pointed out by Mr. Dick Van Frank, an Incinerator Work Group member, that the Incinerator Work Group did not actually agree or disagree with Mr. Crume's statement (i.e., the Incinerator Work Group did not take a position with regard to the statement). Mr. Crume's and Mr. Norm Morrow's recollections are the same as Mr. Van Frank's. Additionally, Ms. Susan Radomski, ERG's meeting recorder, recalls that there was no substantive discussion on the issue, and this is confirmed in the meeting notes. Mr. Tom Waddell, also with ERG, also recalls that there was no substantive discussion. For these reasons, the aforementioned individuals have concluded that the flash minutes are misleading with respect to any substantive discussion about small MWCs and that the Incinerator Work Group did not take a position with respect to small MWCs.

ATTACHMENT 1

FINAL AGENDA
ICCR INCINERATOR WORK GROUP

AGENDA

INCINERATOR WORK GROUP MEETING

November 20, 1997

9:00 am to 4:00 pm

Red Lion Hotel

Houston, TX

MAJOR MEETING OBJECTIVES:

- Review and discuss Coordinating Committee actions and guidance.
- Make progress in reviewing ICR, finalizing subcategory definitions, and developing model plants.
- *Note: There will be an American Petroleum Institute presentation at the Red Lion Hotel from 8 until 9 am. The IWG meeting will start at 9:00 am sharp.*

AGENDA:

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| 9:00 am | Welcome -- Rick Crume
Approval of agenda -- Scott Warner
Review of meeting objectives -- Norm Morrow |
| 9:15 am | Announcements and updates -- Rick Crume |
| 9:30 am | Review of Coordinating Committee actions and guidance:

Overview -- Norm Morrow
Waste definition -- Jeff Shumaker and Dick Van Frank
Implications for IWG -- Group |
| 10:30 am | BREAK |
| 10:45 am | Where do we go from here? -- Rick Crume

Review of steps leading to RAP
Model plant and related guidance |
| 11:15 am | Update on ICR structure, content, and QA status -- Tom Waddell |

11:30 am	LUNCH AND SUBTEAM HUDDLES
2:30 pm	Subteam reports and assigned tasks
3:30 pm	Wrap-up
	Orlando agenda and teleconference scheduling -- Norm Morrow
	Meeting evaluation -- Scott Warner and Group
	Flash minutes -- Susan Radomski
4:00 pm	Adjourn -- Rick Crume

ATTACHMENT 2

MEETING PARTICIPANTS

Meeting Participants

Name	Affiliation
Beth Berglund	Merck & Co, Inc.
Richard Crume	U.S. EPA/OGC
John Devine	U.S. EPA
Dave Maddox	Stanley Furniture Company
Ruth Mahr	Citizens Concerned about Medical Waste Incineration
David Marrack	Galveston-Houston Assoc. for Smog Prevention
Bob Morris	The Coastal Corporation
Norman Morrow	Exxon Chemical Americas
Bill Perdue	Pulaski Furniture Corporation
Susan Radomski	Eastern Research Group, Inc.
Paul Rahill	Industrial Equipment and Engineering Company
Andrew Roth	Regional Air Pollution Control Agency (Ohio)
Kay Rykowski	Stillwater Technologies
Jeff Shumaker	International Paper
Dick Van Frank	National Audubon Society
Tom Waddell	Eastern Research Group
Scott Warner	Eastern Research Group
Ed Wheless	Los Angeles County Sanitation District
Bill Wiley	Consumat Systems, Inc.
Dana Worcester	Association of Container Reconditioners